SAFETY, HEALTH, AND EMERGENCY RESPONSE

Cox Properties – Ag Park Project
Riverside, CA

April 18, 2006

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SITE SAFETY AND HEALTH PLAN

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1.0 INTRODUCTION

This site safety and health plan (SSHP) sets forth the minimum safety and health, and emergency response requirements for activities involving, or potentially involving, employee exposure to safety and health hazards associated with the proposed site operations at the Cox Properties Remediation Project located at the Ag Park in Riverside, California ("the Site"; Figure 1). The planned field activities at the Site include the excavation, stockpiling, loading, off-site transportation, and disposal of material contaminated with elevated concentrations of Polychlorinated Biphenyls (PCB) by Waste Management, Inc. ("WMI") personnel.

If work plan specifications change during or after the preparation of this SSHP, or if site conditions differ as the result of more information, the WMI Health and Safety Director shall be informed immediately and appropriate changes shall be made to this SSHP.

At a minimum, all contractor/subcontractor personnel working on site must:

- have read and understood the specifications of this SSHP
- have completed all training requirements in 29 Code of Federal Regulations (CFR) 1910.120
- provide their own health and safety equipment as indicated in this SSHP, and comply with the minimum requirements established by this SSHP. If the contractor/subcontractor has prepared his/her own SSHP, it must minimally meet requirements contained herein and all applicable Federal, State, and local health and safety requirements.

This SSHP shall be read and approved by the WMI Health and Safety Director, and the WMI Project Manager.

A copy of this SSHP shall be kept on site, easily accessible to all employees and project visitors, and another in WMI files.

This SSHP was prepared using the following documents:

- 29 CFR 1910 -- Occupational Safety and Health Standards, 1990
- 29 CFR 1926 -- Safety and Health Regulations for Construction
- 29 CFR 1910.1000 -- OSHA Air Contaminants - Permissible Exposure Limits, 1990
- Title 8, California Code of Regulations, Occupation Health and Safety Standards.
- American Conference of Governmental Industrial Hygienists (ACGIH). Threshold Limit Values and Biological Exposure Indices for 1990 - 1991. Cincinnati, Ohio, ACGIH.
- California Department of Health Services (DHS), Toxic Substances Control Division (TSCD), Technical and Support Unit, Region 3, Los Angeles, California, August 1988. Site Safety Plan Guidance Document.
- National Institute for Occupational Safety and Health (NIOSH); Occupational Safety and Health Administration (OSHA); U.S. Coast Guard (USCG); U.S. Environmental Protection Agency (EPA), October 1985. Occupational Safety and Health Guidance Manual for Hazardous Waste Site Activities. Washington D.C.: U.S. Government Printing Office.
- NIOSH/OSHA, 1981. Occupational Health Guidelines for Chemical Hazards.
- Sax, N. Irving, 1984, Dangerous Properties of Materials, 6th edition, Van Nostrand Reinhold Company, Inc., New York, New York.
- U.S. EPA, Office of Emergency and Remedial Response, Hazardous Response Support Division, November 1984. Standard Operating Safety Guides.

2.0 SITE CHARACTERISTICS

Site Name: Ag Park
Site Address: Jurupa Avenue & Van Buren Avenue
Riverside, California

2.1 Background

The Site was previously occupied by the City of Riverside as a municipal waste water treatment plant (WWTP).

Previous soil sampling activities conducted at the Site indicated that there are elevated concentrations of PCB in the soil and demolished WWTP concrete structures. Further, elevated levels of chlorinated dibenzo p dioxins (CDDs) and chlorinated dibenzofurans (CDFs) were noted in the soil samples.

3.0 Work Description

Tasks to be performed at the Site include the excavation, stockpiling, loading, off-site transportation, and disposal of the impacted soil.

Work activities are planned in the following order (some activities may be performed concurrently):

- soil excavation/stockpiling
- loading off-site transport trucks
- off-site transportation
- soil disposal

4.0 KEY PERSONNEL AND RESPONSIBILITIES

4.1 WMI Site Safety Personnel

Name	Responsibilities
Rob Heller	Project Manager
George Vernaci	Site Safety Officer
George Vernaci	Health and Safety Director

4.2 WMI Personnel and Responsibilities

The responsibilities of the WMI personnel listed in Section 4.1 are outlined below.

4.2.1 WMI Project Manager

The WMI Project Manager, Rob Heller, has the ultimate responsibility for the health and safety of WMI personnel onsite. As part of his duties, Mr. Heller shall be responsible for:

- keeping the WMI Health and Safety Director informed of project developments

- ensuring that onsite WMI personnel receive the proper training, and are informed of potential hazards anticipated at the Site and procedures and precautions to be implemented on the job

- ensuring that contractors and subcontractors are informed of the expected hazards and appropriate protective measures at the Site. (Subcontractors should also be given a copy of WMI's SSHP for review.)

- ensuring that resources are available to provide a safe and healthy work environment for WMI personnel.

4.2.2 WMI Health and Safety Director

The WMI Health and Safety Director, George Vernaci, shall be responsible for:

- monitoring the health and safety impacts of this project for onsite WMI personnel

- assessing the potential health and safety hazards at the Site

- recommending appropriate safeguards and procedures

- modifying the SSHP, when necessary

- approving changes in safeguards used or operating procedures employed at the Site.

The WMI Health and Safety Director shall have the authority to:

- require that additional safety precautions or procedures be implemented

- order an evacuation of the Site, or portion of the Site, or shut down any operation, if he believes a health or safety hazard exists

- deny unauthorized personnel access to the Site

- require that any worker obtain immediate medical attention

- approve or disallow any proposed modifications to safety precautions or working procedures.

4.2.3 WMI Site Safety Officer

The WMI Site Safety Officer (SSO), George Vernaci, has fulfilled the 40-hour health and safety training requirements pursuant to 29 CFR 1910.120.

The SSO, or a trained designated alternate, will be present at the Site during work activities. The SSO shall be notified of and approve activities in which persons may be reasonably expected to be exposed to contaminated soils and/or groundwater.

The SSO shall be responsible for:

- ensuring that onsite WMI personnel comply with the requirements of the SSHP
- limiting access to the Site
- reporting unusual or potentially hazardous conditions to the WMI Health and Safety Director and the WMI Project Manager
- reporting injuries, exposures, or illnesses to the WMI Health and Safety Director and the WMI Project Manager
- communicating proposed changes in work scope or procedures to the WMI Health and Safety Director for approval
- recommending to the WMI Health and Safety Director and the WMI Project Manager additional safety procedures or precautions that might be implemented.

The SSO shall have the authority to:

- order an evacuation of the Site, or portion(s) of the Site, or shut down any operation if he believes a health or safety hazard exists
- deny site access to unauthorized personnel
- require that any worker, including the contractor's or subcontractor's personnel, obtain immediate medical attention.

5.0 HAZARD ANALYSIS

Potential chemical, physical and general safety hazards during the field activities at the Site include the following:

- Chemical hazards
    - respiratory (exposure to fugitive dust)
    - respiratory and dermal (contact with PCB)
    - ingestion, respiratory and dermal (contact with CDDs and CDFs)
- Physical hazards
    - excavation instability
    - noise
    - electric shock
    - heavy equipment
    - heat stress
    - fire and explosion

Work procedures to protect workers from chemical and physical hazards are discussed in Section 6.0.

5.1 Chemical Hazards

The primary chemical hazards are Polychlorinated Biphenyls based on the laboratory analytical results of previous soil sampling conducted at the Site. Chlorinated dibenzo p dioxins and chlorinated dibenzofurans may also pose a threat. Inhalation exposures are the primary exposure pathway of concern. Dermal contact may aggravate health problems with prolonged exposure to CDDs and CDFs.

Description of the chemical of concern including physical and odor recognition characteristics, effects of short-term exposure for use in the field, and the Permissable Exposure Levels (PEL) (OSHA Standard 29 CFR 1910.1000) are presented below.

5.1.1 Chemical Description of Polychlorinated Biphenyls

Polychlorinated Biphenyls were used in many different types of products including hydraulic fluid, casting wax, pigments, carbonless copy paper, plasticizer, vacuum pumps, compressors, heat transfer systems and others. Their primary use, however, was as a dielectric fluid in

electrical equipment. Because of their stability and resistance to thermal breakdown as well as their insulating properties they were the fluid of choice for transformers and capacitors.

Among the health affects of PCB's are skin ailments called chloracne, reproductive disorders, liver disease and others. PCB's are a suspected human carcinogen and a known animal carcinogen. They are resistant to degradation and therefore persist for many years in the environment. Furthermore, they bioaccumulate in the foodchain and are stored in the body fat of animals and humans.

Short-term exposure to PCBs may cause irritation to the skin, nose, throat, eyes and lungs. Long-term exposure may cause a burning feeling in the eyes, nose and face; lung and throat irritation; nausea; dizziness; and chemical acne. Liver damage and digestive disturbance have been reported in some individuals. PCBs may impair the function of the immune system.

- The TWA of the PEL for PCB is 1,000 $\mu g/m^3$ for PCBs containing 42% chlorine and 500 $\mu g/m^3$ for compounds containing 54% chlorine.

5.1.2 Chemical Description of Chlorinated Dibenzo p Dioxins

CDDs are a family of 75 chemically related compounds commonly known as chlorinated dioxins. One of these compounds, 2,3,7,8-TCDD, is one of the most toxic of the CDDs and is the one most studied. In the pure form, CDDs are crystals or colorless solids. CDDs enter the environment as mixtures containing a number of individual components. 2,3,7,8-TCDD is odorless; the odors of the other CDDs are not known.

CDDs are not intentionally manufactured by industry except for research purposes. They (mainly 2,3,7,8-TCDD) may be formed during the chlorine bleaching process at waste and drinking water treatment plants. They can occur as contaminants in the manufacture of certain organic chemicals, and are released into the air in emissions from municipal solid waste and industrial incinerators.

Exposure to CDDs may occur through:

- Breathing low levels in air and drinking low levels in water.
- Skin contact with certain pesticides and herbicides.
- Living near an uncontrolled hazardous waste site containing CDDs or incinerators releasing CDDs.

- Working in industries involved in producing certain pesticides containing CDDs as impurities, working at paper and pulp mills, operating incinerators, or Working in soil contaminated with high levels of CDDs.

The most noted health effect in people exposed to large amounts of 2,3,7,8-TCDD is chloracne, a severe skin disease with acne-like lesions that occur mainly on the face and upper body. Other skin effects noted in people exposed to high doses of 2,3,7,8-TCDD include skin rashes, discoloration, and excessive body hair. Changes in blood and urine that may indicate liver damage also are seen in people. Exposure to high concentrations of CDDs may induce long-term alterations in glucose metabolism and subtle changes in hormonal levels.

In certain cases, 2,3,7,8-TCDD is especially harmful and can cause death after a single exposure. Exposure to lower levels can cause a variety of effects, such as weight loss, liver damage, and disruption of the endocrine system. In many cases, 2,3,7,8-TCDD weakens the immune system and causes a decrease in the system's ability to fight bacteria and viruses. In other studies, exposure to 2,3,7,8-TCDD has caused reproductive damage and birth defects. Some animal species exposed to CDDs during pregnancy had miscarriages and the offspring of animals exposed to 2,3,7,8-TCDD during pregnancy often had severe birth defects including skeletal deformities, kidney defects, and weakened immune responses.

Several studies suggest that exposure to 2,3,7,8-TCDD increases the risk of several types of cancer in people. Animal studies have also shown an increased risk of cancer from exposure to 2,3,7,8-TCDD. The World Health Organization (WHO) has determined that 2,3,7,8-TCDD is a human carcinogen. The Department of Health and Human Services (DHHS) has determined that 2,3,7,8-TCDD may reasonably be anticipated to cause cancer.

The EPA has set a limit of 0.00003 micrograms of 2,3,7,8-TCDD per liter of drinking water (0.00003 µg/L).

5.1.3 Chemical Description of Chlorinated Dibenzofurans

There are 135 different types of CDFs with varying harmful health and environmental effects. The compounds that contain chlorine atoms at the 2,3,7,8-positions of the dibenzofuran molecule are known to be especially harmful. Not all of the different types have been found in large enough quantities to study the physical properties. However, of those that have been studied, they do not dissolve in water easily and appear to be in the form of colorless solids.

There is no known use for these chemicals. Other than for research purposes, they are not deliberately produced by industry. Most CDFs are produced in small amounts as undesirable by-products of certain processes, such as manufacturing other chemicals or bleaching at waste and water treatment plants. CDFs can also be released from incinerators.

Exposure to CDFs may occur through:

- Breathing air or drinking water that is contaminated, or coming in contact with contaminated soil.
- Using products such as milk cartons, coffee filters, and tampons could result in very low exposures.
- Breathing contaminated workplace air

CDFs caused skin and eye irritations, including severe acne, darkened skin color, and swollen eyelids with discharge from the eyes. CDF poisoning also caused vomiting and diarrhea, anemia, more frequent lung infections, numbness, effects on the nervous system, and mild changes in the liver. Children born to exposed mothers had skin irritation and more difficulty learning.

Many of the same effects that occurred in people also occurred in laboratory animals that ate CDFs. Animals also had severe weight loss, and their stomachs, livers, kidneys, and immune systems were seriously injured. Some animals had birth defects and testicular damage, and in severe cases, some animals died. These effects in animals were seen when they were fed large amounts of CDFs over a short time, or small amounts over several weeks or months.

The Department of Health and Human Services, the International Agency for Research on Cancer, and the Environmental Protection Agency (EPA) have not classified CDFs for carcinogenicity.

There are no federal guidelines or recommendations for protecting human health or the environment from exposure to CDFs.

5.2 Physical Hazards

The potential physical hazards at the Site during the planned activities stem from heavy machinery use and the hazardous nature of excavation work. The potential for heat stress caused by the use of personal protective equipment (PPE) and high mid-day temperatures, has been minimized by specifying the use of lighter PPE in this SSHP. The anticipated physical hazards at the Site are listed under Section 5.0. Work procedures to protect workers from chemical and physical hazards are discussed in Section 6.0.

6.0 WORK REQUIREMENTS

6.1 Respiratory Protection

Field operations will be initiated in Level D. The primary route of potential exposure for chemicals is inhalation of fugitive dust. Dust will be kept to a minimum by continually watering the work area and haul roads. Dust filter masks, will be worn until on-site work zone air monitoring shows levels are below human health concern.

Inhalation hazards due to volatilization will be monitored visually. If onsite dust levels impair visibility during field activities, work shall be temporarily stopped to wet the area responsible for generating dust. If dust problems continue, a temporary stop work order will be observed and the WMI Health and Safety Officer shall be notified.

6.2 Dermal Protection

Unless adequate precautions are taken, chemicals may contact the skin or clothing. Potential physical contact with chemicals of concern are possible under the following circumstances:

* soil excavation and disposal

Due to the potential for adverse effects due to dermal contact with CDD-contaminated soil, long-sleeved shirts and gloves will be worn as part of Level D safety equipment until on-site work zone air monitoring shows levels are below human health concern.

6.2.1 Personal Protective Equipment

WMI and contractor/subcontractor personnel will wear the following protective clothing onsite:

* hard hats
* steel-toed/steel-shank boots
* inner and outer disposable PVC gloves for soil handling (to be changed immediately after handling is completed)
* safety glasses
* uncoated Tyvek coveralls (if the potential for splashing exists)

6.3 Action Levels

6.3.1 Action Levels for a Temporary Stop Work

The SSO shall impose a temporary stop work and contact the WMI Health and Safety Director immediately if the following conditions are observed, or if there is a question about site conditions:

- uncontrolled dust generation
- indications of heat stress
- changes in the general health profile of onsite personnel, including headaches, dizziness, breathing difficulties, irritation to the eyes, nose, throat, and hands

6.4 Protection Against Physical Hazards

6.4.1 Excavation Instability

The limits of excavation and method(s) of shoring side walls proposed by the contractor shall be approved by the engineer before the excavation begins. Workers will not enter excavations deeper than 4 feet. All requirements pursuant to 29 CFR 1926.651 and 652, Excavations, Trenching and Shoring, shall be observed.

6.4.2 Noise

Noise results primarily from excavation equipment, drilling equipment and other machinery. Workers will wear ear plugs when operating heavy machinery to avoid noise that may exceed the 85 decibel Threshold Limit Value (TLV) established by the American Conference of Governmental Industrial Hygienists. However, based on previous field experience, expected noise level should not exceed 85 decibels.

6.4.3 Electric Shock

All electrical equipment to be used during field activities will be suitably grounded and insulated.

6.4.4 Heavy Equipment

Hazards related to excavation and compaction equipment will necessitate securing the work area. All relevant requirements pursuant to 29 CFR 1926.602 and Subpart W, Rollover Protective Structures; Overhead Protection, shall be observed during the course of excavation activities.

All field personnel not directly involved in the excavation work will be kept at safe distances from areas where heavy equipment are in use. Unauthorized visitors will not be permitted near

areas where heavy equipment are in use regardless of whether the area has been designated as an exclusion zone.

6.4.5 General Safety

All WMI and contractor/subcontractor personnel will wear approved head protection while working around heavy equipment in the Site area. Fire hydrants, electrical and underground lines and pipes will be identified before excavation operations begin. Two 10-pound fire extinguishers will be kept on site near the exclusion zone.

6.5 Entry Procedures

At a minimum, all visitors entering the exclusion zone must wear the protective clothing and equipment worn by WMI and contractor/subcontractor personnel. Permission to enter the work area must be obtained from at least one of the personnel named in Section 4.0. Each visitor's name and purpose of visit will be recorded in the field notes.

7.0 WORK ZONE AND DECONTAMINATION PROCEDURES

A site must be controlled to reduce the possibility of exposure to any contaminants present and to limit their transport from the site by personnel or equipment.

7.1 Control

A control system is required to ensure that personnel and equipment working on hazardous waste sites are subjected to appropriate health and safety surveillance and site access control.

The possibility of exposure or translocation of contaminants can be reduced or eliminated in a number of ways, including:

- setting security or physical barriers at control points to regulate access to and/or exclude unnecessary personnel from the general area
- minimizing the number of personnel and equipment on site consistent with effective operations
- establishing work zones within the site
- conducting operations in a manner which will reduce the exposure of personnel and equipment

- minimizing the airborne dispersion of contaminants (utilizing dust control procedures)
- implementing appropriate decontamination procedures for both equipment and personnel.

7.2 Field Operations Work Areas

Work areas (zones) will be established based on anticipated contamination. Within these zones, prescribed operations will occur utilizing appropriate PPE. Movement between areas will be controlled at checkpoints. The planned zones are:

- Exclusion (contaminated)
- Contamination Reduction
- Support (noncontaminated).

7.2.1 Exclusion Zone

The Exclusion Zone is the innermost area of the three concentric rings and is considered contaminated, dirty, or "hot." Within this area, the prescribed protection must be worn by any personnel upon entering. An entry checkpoint will be established at the periphery of the exclusion zone to control the flow of personnel and equipment between contiguous zones, and to guarantee that the procedures established to enter and exit the zones are followed.

The Exclusion Zone boundary will be established initially on the presence of the contaminant(s) within the area. Subsequent to initial operations, the boundary may be readjusted based on observations and/or measurement. The boundary will be physically secured and posted.

7.2.2 Contamination Reduction Zone

Between the Exclusion and the Support Zone is the Contamination Reduction Zone. The purpose of this zone is to provide an area to prevent or reduce the transfer of contaminants which may have been picked up by personnel or equipment returning from the Exclusion Zone. All decontamination activities occur in this area. The boundary between the Support Zone and the Contamination Reduction Zone is the contamination control line. This boundary separates the potentially contaminated area from the clean area. Entry into the Contamination Reduction Zone from the clean area will be through an access control point. Personnel entering at this station will be wearing the prescribed PPE for working in the Contamination Reduction Zone. Exiting the Contamination Reduction Zone to the Clean Area requires the removal of any suspected or known contaminated PPE, and compliance with the established decontamination procedures.

7.2.3 Support Zone

The Support Zone is the outermost of the three rings and is considered decontaminated, or Clean Area. It contains the Command Post (CP) for field operations and other elements necessary to support site activities. Normal street or Level D work clothes are the appropriate apparel to be worn in this area.

7.3 Zone Dimensions

Considerable judgement is needed to ensure safe working distances for each zone, balanced against practical work considerations. Physical and topographical barriers may constrain ideal locations. Field/laboratory measurements combined with meteorological conditions and air dispersion calculations will assist in establishing the control zone distances. When not working in areas that require the use of chemical-resistant clothing, work zone procedures may still need to limit the movement of personnel and retain adequate site control.

7.4 Decontamination Procedures

As part of the system to prevent or reduce the physical transfer of contaminants by people and/or equipment from the site, procedures will be instituted for decontaminating anything leaving the Exclusion Zone and Contamination Reduction Zone. These procedures include the decontamination of personnel, protective equipment, monitoring equipment, clean-up equipment, etc. Unless otherwise demonstrated, everything leaving the Exclusion Zone should be considered contaminated. In general, decontamination at the site consists of dry brushing equipment with a stiff bristle brush. Reusable decontaminated PPE will be stored for air drying.

Decontamination is addressed in two ways: the physical arrangement and control of contamination zones, and the effective use of decontamination procedures.

If necessary, the decontamination process may use cleaning solutions, followed by rinse solutions. Used solution, brushes, sponges, and containers must be properly disposed of.

Decontamination Solution

Description	Usage	
3 cups Alconox 1 cup sodium carbonate	Light contamination	5-8 gallons water
Commercial Detergent -	Organic contaminants	Full strength or diluted

As with all alkaline cleaners, continuous or repeated contact with the skin should be avoided. If an employee's skin becomes contaminated, he/she will move to the decontamination area and remove contaminated clothing, and wash with a mild soap/detergent and water to remove any contaminant from the skin. He/she will then see a physician for possible medical treatment.

A rinse solution will be used to remove the contamination solution and neutralize any excess decontamination solution.

All personnel will follow these decontamination procedures:

1. When returning from the Exclusion Zone, remove heavy soil, as necessary, from boots, gloves, and clothing by using a stiff bristle brush before entering the Contamination Reduction Zone.

2. Remove disposable suit and discard in proper container.

3. Remove outer gloves and dispose of properly.

4. Remove inner gloves and dispose of properly.

Decontamination procedures may be modified, if necessary, with the approval of the SSO.

7.4.1 Personal Decontamination During Medical Emergencies

In the event of personal injury, first-aid personnel must decide if the victim's injuries are potentially the type that would be aggravated by movement. If there is any doubt, or if the victim is unconscious and cannot respond, no attempt should be made to move the victim to the decontamination area. Only off-site paramedics may move such victims. If the paramedics approve, the victim's PPE will be cut off in the Decontamination Reduction Zone. If the decision is made not to remove the victim's protective clothing, he/she will be wrapped in a tarp or similar object to protect the ambulance and crew during transportation. If the victim is contaminated with materials that threaten to cause additional injury or immediate health hazards, the PPE will be carefully removed and the victim washed appropriately.

8.0 EMERGENCY PROCEDURES

8.1 General Injury

- Step 1: Use first-aid kit on site, if appropriate.
- Step 2: Use off-site help and/or assistance if appropriate.
- Step 3: Notify SSO, Project Manager and Health and Safety Director.

8.2 Specific Treatments

- Eye Exposure: flush eye with eye wash, call ambulance.
- Skin Exposure: wash immediately with soap and water; call ambulance, if necessary.
- Fire (localized): use fire extinguisher and activate alarm system, if necessary.
- Fire (uncontrolled): call Fire Department.
- Chemical Spill: call Fire Department and National Response Center for Toxic Chemical and Oil Spills.
- Explosion: call Fire Department if potential for additional explosions or fire danger exists.
- Inhalation: move affected person(s) to fresh air and cover source of vapors, if appropriate.
- Swallowing: call ambulance.

8.3 Emergency Phone Numbers

Medical/General Service Numbers

Police Department	911
Fire Department	911
Ambulance	911

Hospital

Parkview Community Hospital (951) 688-2211
3865 Jackson Street
Riverside, California

From the Site, proceed to Van Buren Boulevard. Turn right on Van Buren Boulevard and proceed south. Continue south on Van Buren Boulevard and turn left on Jackson Street. Proceed southeaste on Jackson Street to Parkview Community Hospital. Turn left into Medical Center. Parkview Community Hospital is located at 3865 Jackson Street (Figure 1).

Hazardous Materials Response/Reporting

National Emergency Response Center (800) 424-8802
California State Office of Emergency Services (800) 852-7550
Regional Water Quality Control Board (858) 467-2952

8.4 Accident Reporting Procedures

In the event of an emergency, contact the following:

George Vernaci (Health and Safety Director) (909) 949-0360
Robert Heller (Project Manager) (714) 771-5554
George Vernaci (Site Safety Officer) (909) 949-0360

If an exposure or injury occurs, work shall be temporarily halted until the SSO, in consultation with the Health and Safety Director, decides it is safe to continue work.

9.0 DOCUMENTATION

The SSO will record field observations of health and safety procedures by workers conducting the planned activities outlined in Section 3.0, including deviations from the recommended health and safety procedures.

10.0 MEDICAL MONITORING

Appropriate medical monitoring will be required of personnel to:

- Meet requirements of 29 CFR 1910.120 (f).
- Meet requirements for respirator use.
- Meet other legal requirements.

A signed physician's statement qualifying the individual for the work to be performed will be required as part of the medical monitoring program.

11.0 TRAINING PROGRAM

1. The SSO shall have fulfilled all appropriate training requirements indicated by 29 CFR 1910.120 (e), including the 40-hour training requirement and required refresher courses.

2. A tailgate session to discuss this SSHP will be held before field activities begin. All personnel and contractor/subcontractor employees shall receive, at a minimum, the following information:

   - the names of personnel and alternates responsible for site safety and health
   - safety, health, and other hazards at the Site
   - instruction in the use of personal protective equipment
   - action levels
   - employee work practices to minimize risks from onsite hazards
   - instruction in the safe use of engineering controls and equipment on site
   - site control measures
   - emergency plans
   - Proposition 65 warnings.

12.0 PROPOSITION 65

Under California's Safe Drinking Water and Toxic Enforcement Act of 1986 (Proposition 65), individuals who may be exposed in the work place to chemicals that may cause cancer or birth defects must be warned of such hazards pursuant to California Health and Safety Code (HSC) Section 25249.6. At this Site, the chemicals that may cause cancer or reproductive abnormalities, and their respective warnings, are listed below.

12.1 Carcinogens and Reproductive Toxicants

Chemicals known to the State of California to cause cancer, as listed in Title 22, California Code of Regulations (CCR) Section 12000(b), which may be present at the Site include benzene. Chemicals known to the State of California as reproductive toxicants, as listed in Title 22, CCR Section 12000(b), which may be present at the Site include lead.

12.2 Warnings

Pursuant to HSC Section 25249.6 and CCR Sections 12601(c)(3)(A) and 12601(c)(3)(B), the following warnings must be made:

"This area contains chemicals known to the State of California to cause cancer."

13.0 SIGNATURES

13.1 Waste Management Personnel

This SSHP for the proposed site operations at the Ag Park Project in Riverside, California, is approved by the following Waste Management personnel and Waste Management Representatives:

George Vernaci Health and Safety Director	Date
Rob Heller Project Manager	Date
George Vernaci Site Safety Officer	Date

13.2 Contractor and Subcontractor Personnel

Contractor and Subcontractor Agreement:

1. Contractor certifies that the following personnel noted below to be employed in the soil remedial activities at the Support Sector/Air Operations facility in San Diego, California, have met the requirements of the OSHA Hazardous Waste Operations and Emergency Response Standard 29 CFR 1910.120 and other applicable OSHA Standards.

2. Contractor certifies that in addition to meeting the OSHA requirements, it has received a copy of this SSHP, and will ensure that its employees are informed and will comply with both OSHA requirements and the guidelines in this SSHP.

3. Contractor further certifies that it has read, understands and will comply with all provisions of this SSHP, and it will take full responsibility for the health and safety of its employees.

Subcontractor	Signature	Date